

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>NEIGHBORS LEGACY HOLDINGS, INC., <i>et al.</i>, Debtors.</b>	§	<b>Case No. 18-33836 (MI)</b>
	§	
	§	<b>CHAPTER 11</b>
	§	
<b>SOHAIL ALAM, Plaintiff,</b>	§	
	§	
	§	
<b>vs.</b>	§	<b>ADVERSARY NO. 19-3442 (MI)</b>
	§	
<b>NEIGHBORS GP LLC, <i>et al.</i>, Defendants.</b>	§	<b>HEARING DATE:</b>
	§	<b>August 17, 2020 at 10:00 A.M. (CST)</b>

**LIQUIDATING TRUSTEE’S WITNESS AND EXHIBIT LIST**

Tensie Axton, Trustee of the Liquidating Trust of Neighbors Legacy Holdings, Inc. and certain of its affiliates and subsidiaries (the “Liquidating Trustee”) files this Witness and Exhibit List for the hearing on *Liquidating Trustee’s Amended Motion for Entry of an Order Approving Settlement of Controversies with Sohail Alam Pursuant to Rule 9019* [Main Case Docket No. 1116 and Adv. P. Docket No. 121] to be held on August 17, 2020 at 10:00 a.m.

**Witnesses**

The Liquidating Trustee may call the following witnesses at the hearing:

1. Tensie Axton, Trustee of the Liquidating Trust of Neighbors Legacy Holdings, Inc.
2. Sohail Alam, Plaintiff.

The Liquidating Trustee reserves the right to call any other witness designated by another party, any witness used for impeachment, and any witness necessary to lay the foundation for admission of exhibits.

**Exhibits**

The Liquidating Trustee reserves the right to introduce into evidence at the hearing the following:

<b>No.</b>	<b>Description</b>	<b>M A R</b>	<b>O F F</b>	<b>O B J</b>	<b>A D M</b>	<b>D A T</b>	<b>Disposition After Trial</b>
1.	Liquidating Trustee's Amended Motion for Entry of an Order Approving Settlement of Controversies with Sohail Alam Pursuant to Rule 9019 [Main Case Dkt. No. 1116; Adv. P. Dkt. No. 121]						
2.	Settlement Agreement [Main Case Dkt. No. 1116-1; Adv. P. Dkt. No. 121-1]						
3.	Debtors' First Amended Joint Plan of Liquidation of Neighbors Legacy Holdings, Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code [Main Case Dkt. No. 772]						
4.	Liquidating Trust Agreement by and among the Liquidating Debtors and Tensie Axton, as Liquidating Trustee, dated as of April 8, 2019 [Main Case Dkt. No. 1068-1]						
5.	Alam's Motion to Provide More Clarity on the Second Amended Complaint, in the Alternative the Permission to Submit Third Amended Complaint Pursuant to Defendant's Motion to Dismiss [Adv. P. Dkt. No. 69]						
6.	The Liquidating Trustee's Response to Alam's Motion to Provide More Clarity on the Second Amended Complaint, in the Alternative the Permission to Submit Third Amended Complaint Pursuant to Defendant's Motion to Dismiss [Adv. P. Dkt. No. 72]						
7.	Alam's Response to Axton and Motion to Take Judicial Notice and Request for Evidentiary Hearing [Adv. P. Dkt. No. 73]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
8.	The Liquidating Trustee's Motion to Strike Alam's Motion for Judicial Notice [Adv. P. Dkt. No. 74]						
9.	Alam's Response and Objections to Defendant Axton's Motion to Strike Alam's Motion for Judicial Notice [Adv. P. Dkt. No. 75]						
10.	Alam Letter to the Court [Main Case Dkt. No. 1038; Adv. P. Dkt. No. 76]						
11.	Liquidating Trustee's Objection to Sohail Alam's Claim No. 197 [Main Case Dkt. No. 1039]						
12.	Alam's Objection and Response to Liquidating Trustee's Objection to Sohail Alam's Claim as a Creditor and Request to Appoint the United States Attorney Mr. Ryan Kelly Goeb Patrick to Investigate the Cover Up that Lingers This Bankruptcy [Main Case Docket Nos. 1045 and 1046]						
13.	Liquidating Trustee's (I) Reply in Support of Objection to Sohail Alam's Claim No. 197 and (II) Response to Requests for Affirmative Relief Contained in Mr. Alam's Filings at Docket Nos. 1045 and 1046 [Main Case Dkt. No. 1050]						
14.	Liquidating Trustee's Amended (I) Reply in Support of Objection to Sohail's Claim No. 197; and (II) Response to Requests for Affirmative Relief Contained in Mr. Alam's Filings at Docket Nos. 1045 and 1046 [Main Case Docket No. 1051]						
15.	Alam's Reply to Liquidating Trustee's Response to Sohail Alam's Claim as a Creditor on March 17, 2020 [Adv. P. Docket No. 88]						
16.	Alam's Motion for Summary Judgment [Adv. P. Docket No. 78]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
17.	Alam's Letter to the Court [Main Case Dkt. No. 1048]						
18.	Alam's Motion to Amend [Adv. P. Docket No. 84]						
19.	Liquidating Trustee's Reply in Support of Neighbors GP, LLC, Neighbors Health, LLC, EDMG, LLC, and Tensie Axton's Rule 12(b)(6) Motion to Dismiss Sohail Alam's Second Amended Complaint [Adv. P. Dkt. No. 94]						
20.	The Liquidating Trustee's Response to Alam's Motions for Leave to Amend Complaint and to File Third Amended Complaint [Adv. P. Dkt. No. 106]						
21.	Alam's Motion to Disqualify and Remove Tensie Axton, Liquidating Trustee of the Liquidating Trust of Neighbors Legacy Holdings, Inc. [Main Case Dkt. No. 1061 and Adv. P. Dkt. No. 91]						
22.	Liquidating Trustee's Response to Alam's Motion to Disqualify and Remove Tensie Axton, Liquidating Trustee of the Liquidating Trust of Neighbors Legacy Holdings, Inc. [Main Case Docket No. 1068 and Adv. P. Docket No. 96]						
23.	Alam's Reply to Axton's Response to His Motion to Remove Tensie Axton as the Liquidating Trustee, and, Alam's Objections to the Courts Ruling on Confirmation of the Debtors Plan, Dated March 22, 2019 [Adv. P. Dkt. No. 103]						
24.	Alam's Response to Axton's Response to Alam's Motion to Quash the Amended Notice of Deposition and for Protective Order [Adv. P. Dkt. No. 107]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
25.	Alam's Motion to Disqualify and Sanction [Porter Hedges Attorneys] [Main Case Dkt. No. 1060 and Adv. P. Dkt. No. 90]						
26.	Liquidating Trustee's Response to Alam's Motion to Disqualify and Sanction [Main Case Dkt. No. 1074 and Adv. P. Dkt. No. 97]						
27.	Alam's Motion to Deny Defendants Motion to Dismiss Based on New Evidence and Open Discovery [Main Case Dkt. No. 1059 and Adv. P. Dkt. No. 92]						
28.	Liquidating Trustee's Reply in Support of Neighbors GP, LLC, Neighbors Health, LLC, EDMG, LLC, and Tensie Axton's Rule 12(b)(6) Motion to Dismiss Sohail Alam's Second Amended Complaint [Adv. P. Dkt. No. 94]						
29.	Alam's Response to Liquidating Trustee's Reply to His Motion to Deny Defendants Motion to Dismiss Based on New Evidence and Open Discovery [Adv. P. Dkt. No. 101]						
30.	Alam's Third Motion to Amend [Adv. P. Dkt. No. 93]						
31.	Alam's Motion to Dismiss Debtor [Main Case Dkt. No. 1069 and Adv. P. Dkt. No. 95]						
32.	Alam's Motion to Supplement the Record to His Motion to Dismiss Debtors Bankruptcy Under 11 U.S.C. § 1112(b); 11 U.S.C. § 523(a)(2)(A), and Request for this Court to Withhold Ruling Including the Defendants Motion to Dismiss Pending the Final Ruling on His Motion to Dismiss Debtors Bankruptcy and Completion of Mr. Henry G. Hobbs, US Trustee's Investigation into this Bankruptcy [Adv. P. Dkt. No. 100]						

<b>No.</b>	<b>Description</b>	<b>M A R</b>	<b>O F F</b>	<b>O B J</b>	<b>A D M</b>	<b>D A T</b>	<b>Disposition After Trial</b>
33.	The Liquidating Trustee's Response to Alam's Motion to Dismiss Debtors' Bankruptcy and Sur-reply to Alam's Reply to Axton's Response to his Motion to Remove Tensie Axton as the Liquidating Trustee [Main Case Dkt. No. 1077 and Adv. P. Dkt. No. 104]						
34.	Alam's Amended Motion for Leave to file Third Amended Complaint [Adv. P. Dkt. No. 98]						
35.	Alam filed his reply on May 19, 2020 [Adv. P. Dkt. No. 108]						
36.	Alam filed a Motion for Emergency Hearing, in the Alternative, Motion to Allow Parties to Proceed with Discovery [Main Case Docket No. 1080 and Adv. P. Dkt. No. 109]						
37.	Alam's Letter to the Court Requesting Leave to Amend His Pleading. [Adv. P. Dkt. No. 112]						
38.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases						
39.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party						
40.	Any exhibit listed by any other party						

Dated: August 13, 2020  
Houston, Texas

**PORTER HEDGES LLP**

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**COUNSEL FOR TENSIE AXTON,  
LIQUIDATING TRUSTEE OF THE  
NLH LIQUIDATING TRUST**

**CERTIFICATE OF SERVICE**

I certify that on August 13, 2020, the foregoing was served via electronic mail and USPS, postage prepaid, on the party below and was also served via CM/ECF on all parties requesting notice.

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/s/ Heather K. Hatfield  
Heather K. Hatfield